

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)

Federal Communications Commission
Office of Secretary

MM Docket No. 87-268

To: The Commission

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**COMMENTS OF THE FORESTRY-CONSERVATION COMMUNICATIONS
ASSOCIATION**

The Forestry-Conservation Communications Association ("FCCA") hereby submits the following comments in response to the above-captioned "Advanced Television Systems" proceeding, FCC 96-317, released August 14, 1996, in which the Commission proposes a channel allotment for digital television ("DTV").

FCCA is the Commission's certified Part 90 radio frequency coordinator for the Forestry -Conservation Radio Service. FCCA also represents its parent organizations, the National Association of State Foresters ("NASF") and the International Association of Fish and Wildlife Agencies ("IAFWA"), on matters related to radio communications. The members of NASF and IAFWA provide a full range of public safety related services, including fire protection, law enforcement, and emergency medical services over wide areas of state-owned and/or protected lands. Most of these agencies operate statewide radio systems utilizing land mobile spectrum located just below VHF channel 7 at 150-174 MHz and below UHF channel 14 at 450-470 MHz.

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FCCA supports the Commission's DTV allotment plan in the Sixth Further Notice of Proposed Rulemaking ("Sixth FNPRM") insofar as it will result in the recovery of broadcast television spectrum for reallocation to public safety uses. In addition, FCCA is currently a member of the Land Mobile Communications Council ("LMCC"), and thus, supports the general thrust of LMCC's comments filed in this proceeding.

FCCA also fully supports the findings and recommendations made by NTIA's and the Commission's Public Safety Wireless Advisory Committee ("PSWAC") as documented in its "Final Report."¹ PSWAC found that there currently exists a substantial requirement for new spectrum for use by public safety agencies. The Final Report recommended that the FCC and NTIA (1) allocate 2.5 MHz of spectrum immediately for interoperability, (2) allocate an additional 25 MHz within five years, and (3) develop a comprehensive plan and commitment to provide an additional 70 MHz of spectrum for public safety use over the next 15 years.²

Specifically, FCCA requests that the Commission seriously consider the recovery of a portion of the spectrum currently located in low band UHF channels between 14-20, and VHF band channels 7-13, for reallocation to public safety use. FCCA's forestry conservation members must utilize statewide wide-area radio systems for reliable communications in the heavily wooded and mountainous terrain in which they operate. Spectrum between UHF channels 60-69 (746-806 MHz) is unlikely to satisfy these needs due to poor propagation characteristics in heavy foliage, and the need for numerous

¹ See Final Report of the Public Safety Wireless Advisory Committee, September 11, 1996.

² Id. at 3.

repeaters to cover large expanses of wilderness lands. While FCCA agrees that the Commission should recover and reallocate portions of UHF channels 60-69 to public safety, the specialized spectrum requirements of FCCA's members require that the Commission also modify its DTV allotment plan to free-up additional spectrum in the VHF high band channels and lower UHF channels.

FCCA is pleased that the Commission is finally taking steps to find additional public safety radio spectrum, and urges that the Commission move with all deliberate speed to complete this proceeding and move forward to address the spectrum needs of those agencies that protect the safety of life and property.

Respectfully submitted,

FORESTRY CONSERVATION
COMMUNICATIONS ASSOCIATION

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